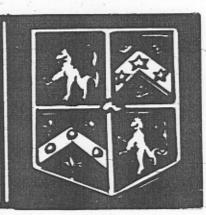
GENERAL MANAGEMENT PLAN Recommended Development Actions March 1990





NATIONAL HISTORIC SITE / MARYLAND

RECOMMENDED: Date <u>Feb.</u> 28, 1990

Durght C. Storke, Jc.

Dwight C. Storke, Jr.

Superintendent

George Washington Birthplace NM/Thomas Stone NHS

APPROVED:

Date 3/6/90

James W. Coleman, Jr. Regional Director Mid-Atlantic Region

GENERAL MANAGEMENT PLAN

Recommended Development Actions for Thomas Stone National Historic Site

U.S. Department of the Interior National Park Service Mid-Atlantic Region

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INTRODUCTION

LOCATION

Thomas Stone National Historic Site is located in Charles County, Maryland, approximately one hour's driving distance from Washington, D.C. and Fredericksburg, Virginia, and one and one half hour from Baltimore and Richmond. The site, known as "Habre de Venture," was the country home of Thomas Stone, signer of the Declaration

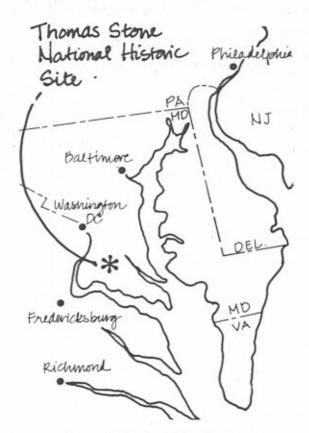


figure 1: Regional location map

of Independence and prominent statesman. Habre de Venture is situated in a rural southern Maryland agricultural setting reminiscent of Thomas Stone's time.

LEGISLATIVE HISTORY

Thomas Stone National Historic Site was authorized by an Act of Congress, P.L. 95-625, November 10, 1978 (see appendix). The Act authorized the Secretary of the Interior to acquire the home and grounds, known as Habre de Venture, and limits land acquisition to \$600,000 and development to \$400,000. The Act did not clearly state a specific purpose for the historic site. The legislative history taken from the congressional record provides a better description and purpose of the site.

The Honorable Robert E. Bauman, Representative from Maryland, made the following comments on the House floor on July 10, 1978:

"By the House's action today we have approved acquisition and repair of the Thomas Stone home by the National Park Service which already has designated Habre-de-Venture as a National Historic Landmark. This site could easily be restored to its full beauty and operated as a working colonial residence and farm, much as is done by the National Park Service at

the birthplace of George Washington, "Wakefield" in Westmoreland County, Virginia."

The Honorable Charles Mathias Jr., Senator from Maryland, commented as follows on the floor of the Senate on October 12, 1978:

"This provision of the omnibus parks bills will permit the acquisition, restoration, refurbishing, and opening to the public of this grand Georgian mansion . . ."

PURPOSE AND NEED FOR THE PLAN

Management Objectives

The National Park Service has established management objectives to provide a framework which would allow park managers and planners to fulfill the purpose of the park. The following management objectives were developed for Thomas Stone National Historic Site:

- 1. To preserve and protect the resources of Thomas Stone National Historic Site that are essential for commemorating Thomas Stone; a member of the Continental Congress, signer of the Declaration of Independence, Maryland State Senator, and prominent lawyer.
- 2. To manage and protect the natural resources of the site consistent with the need to interpret agrarian lifestyles and

re-establish historic landscapes.

3. To rehabilitate those structural and landscape elements which are essential for interpreting Habre de Venture, the home of Thomas Stone, as well as 19th century farming practices and buildings which lend to the history of the site.

PLANNING HISTORY

Although the park was authorized as a National Historic Site in 1978, no development or active management has taken place until recent years. A task directive for the development of a General Management Plan/ Environmental Assessment (GMP/EA) was prepared in September 1987. Shortly thereafter, the planning team organized a series of meetings and workshops with the Maryland State Historic Preservation Office, Charles County Commissioners, Tri-County Council, Charles County Historical Organizations and the Maryland Congressional Delegation. A public meeting was held early on to introduce the NPS planning process and allow individuals and groups the opportunity to identify important issues and concerns related to the site. A newsletter summarizing the results of the meetings was distributed to a broad audience and an invitation was extended to participate in the planning process.

In April, 1988, a Draft Alternative Concepts Report was released by NPS outlining three alternative concepts. This preliminary report was prepared to provide the public the opportunity to review and comment on possible alternative concepts. The planning team sponsored a walking tour of the historic site to enable visitors to better visualize various development alternatives. As a follow-up to the site visit, a more formal public meeting was held to discuss and record comments and ideas. Following a 45 day review period, the team analyzed all comments and chose a preferred course action.

A draft General Management Plan/ Environmental Assessment was completed in the spring of 1989. This is a comprehensive report outlining a preferred proposal and two alternatives for the preservation, management and use of the site and its resources. The assessment portion of the document provides descriptions of socio-economic influences, cultural and natural resources, and an analysis of the environmental impacts relative to each of the development alternatives. The information in the Draft GMP is the basis for the recommended development actions in this report.

Planning Issues and Management Concerns

The planning for the site has been influenced by factors which have placed certain restraints on the type of development and uses appropriate for the Thomas Stone site. Several major issues directly affecting the development of the preferred proposal are explained as follows:

Habre de Venture, the home built

by Thomas Stone in 1771, was severely damaged by a fire in 1977, leaving only the wings, exterior brick walls and the chimney of the central core standing. Approximately ten percent of what is left of the central core of the house dates to Thomas Stone's time.

In addition, the farm itself has undergone changes. The existing structures and foundations on the estate were built during parts of three centuries, and changes in land use were made as farming practices and the agricultural economy changed.

- 2. The turn of the century (1900) is the earliest date for which all historically significant additions are included within configuration of Habre de Venture. Restoration to an earlier period would necessitate removal of those additions. Furthermore, changes that have taken place over the 18th and 19th centuries are evidence of the history and development of the site and are significant in their own right.
- Extensive research has been done in an attempt to document the life of Thomas Stone and his use of Habre de Venture. However, there is much that remains unknown, as little historical documentation has been found to exist about Stone and his property. It is important that the development and interpretation of the site do not mislead the visitor, but provide a clear understanding of the historical significance of the resources.

RECOMMENDED SITE DEVELOPMENT

GENERAL SITE DEVELOPMENT

Habre de Venture, the homesite of Thomas Stone, has undergone numerous changes over time. Much of its appearance today is historically significant, but does not relate to Thomas Stone. Complicating matters further is the lack of documented information on the site's appearance during Stone's occupancy. This plan

would restore the site to its appearance circa 1900. Restoration to an earlier period would require the removal of historically significant 18th and 19th century additions. Remaining significant archaeological and architectural resources within the mansion house complex are to be preserved. Development and interpretation would be designed to provide visitors with a clear understanding of the changes in the site over time.

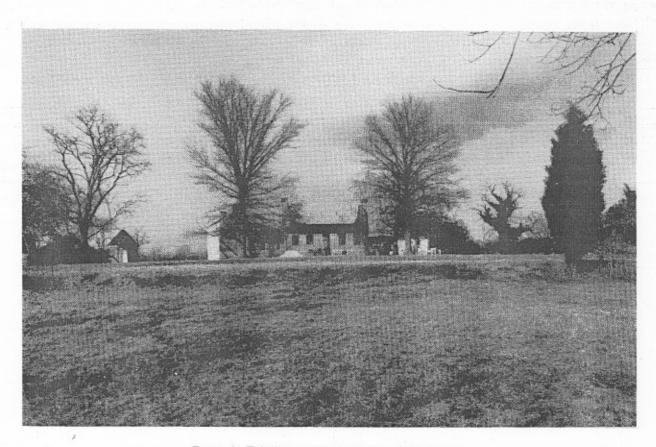
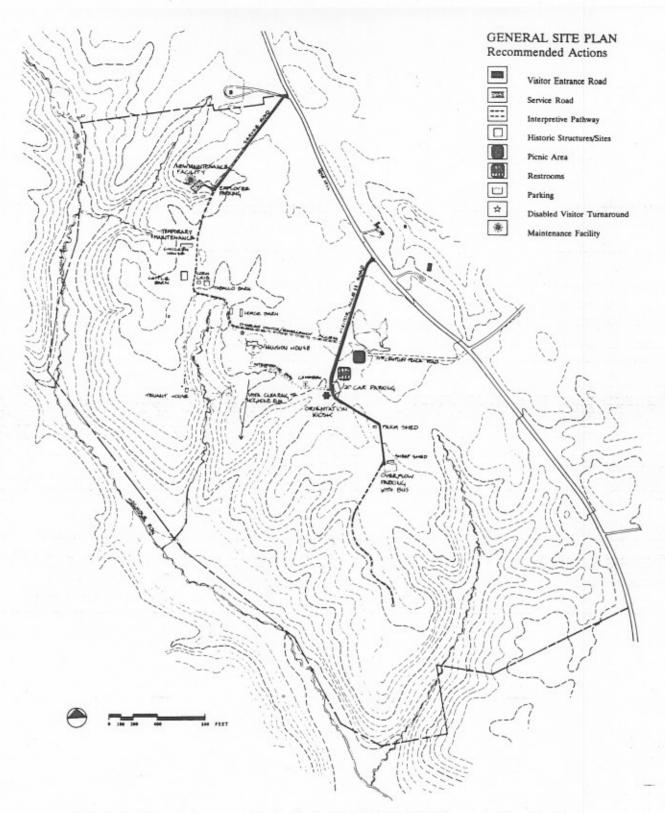


figure 2: Existing condition of mansion house



GENERAL MANAGEMENT PLAN

Thomas Stone National Historic Site Charles County, Maryland MARO/winter 1990/477-80003

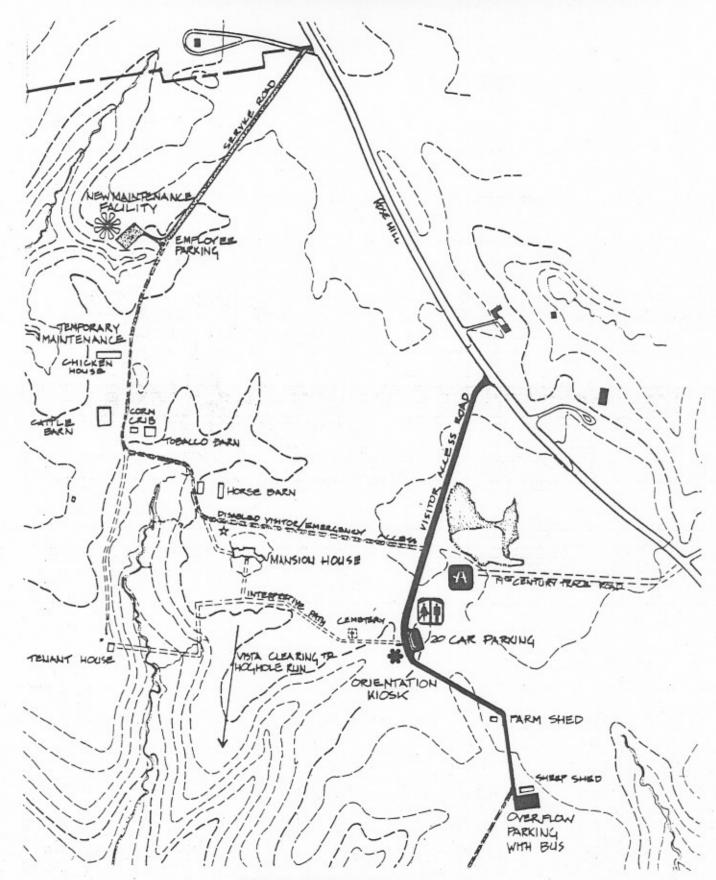


figure 3: Site plan enlargement

All new development would take place in designated development zones screened from the historical setting. New development would include the construction of a new access road on the northernmost border, providing access to the maintenance area and employee parking. A picnic area, restroom facilities and parking would be located just east of the cemetery.

Access and Circulation

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Road alignment and safety considerations prevent the 19th century entrance from being reconstructed. Thus, the present access will remain, but upgraded to allow two-way access. The present road follows a linear path from Rose Hill Road (approximately 800 feet) to where the road turns west toward the house. At this point, a new road will be cut to extend along the wooded edge that will access parking just southeast of the cemetery.

The road continues on the existing gravel road to an overflow car and bus parking area in the vicinity of the sheep shed. From the parking area, the visitor will have direct access to restrooms, picnic area and the primary pathway leading to the mansion house. Disabled visitors will be able to drive to the house using the emergency access road. The primary interpretive trail will commence from the parking area and proceed past the cemetery entering the house through the formal terraces. A loop trail starting from the west wing of the house will follow road traces and

fencerows past 19th century farm buildings that will allow for the interpretation of farming practices and land use.

A service road for park employees will enter off Rose Hill Road at the northernmost border of the park. The road will access the maintenance/ artifact storage building and employee parking lot. The road should be sited along the wooded edge to minimize intrusion into the historic setting.

INTERPRETATION

Interpretive Themes

Three interpretive themes have emerged as a means for visitors to gain an understanding and appreciation for Thomas Stone's life and political career as well as the land use and development of Habre de Venture.

- 1. THE LIFE AND CAREER OF THOMAS STONE, IN THE CONTEXT OF THE WAR FOR INDEPENDENCE AND THE DEVELOPMENT OF A NEW NATION
- THE HISTORY OF LAND USE AND DEVELOPMENT OF HABRE DE VENTURE
- 3. THE HISTORY OF THE PORT TOBACCO AREA AS IT RELATES TO THOMAS STONE

Habre de Venture, the homesite of Thomas Stone from 1772 to 1787, has undergone numerous changes in ownership and development, altering the site substantially. Thus, interpretation becomes a pivotal tool for providing the visitor with a clear understanding of these changes. The history of land use and development of Habre de Venture will serve as an introductory theme to help orient the visitor to the present day scene.

The mansion house and grounds will be used as the stage to interpret the primary theme, "the life and career of Thomas Stone." A separate but interrelated theme, the history of the Port Tobacco area, would provide the historical context for Stone's occupancy of Habre de Venture.

Interpretive Opportunities

Upon arrival, interpretive exhibits will introduce the visitor to the history of land use and changes in development at Habre de Venture. A pathway leading from the parking area to the Stone family cemetery offers an opportunity to interpret several generations of the Stone family, many of which made significant contributions to the county, state and nation. The path continues on to the mansion house where visitors would be greeted by a uniformed ranger and oriented to Thomas Stone National Historic Site. Interpretive exhibits within the house could focus on how and why a community leader, lawyer and family man like Thomas Stone could decide to join a rebellion against

his King and sign the Declaration of Independence.

Local efforts to locate the Stone law library continue. If located, an opportunity exists to expand the interpretation of colonial law by developing an exhibit plan to incorporate these findings.



figure 4: Thomas Stone

Many landscape features such as vistas to and from the mansion, open fields, woods and fence lines will be preserved to demonstrate the continuum of land use history at Habre de Venture. A self-guided interpretive trail following the existing road and farm road traces will take the visitor past 19th century farm buildings.

MANAGEMENT ZONING

The Park Service designates management zones in order to provide a framework for planning decisions on use and development within the park.

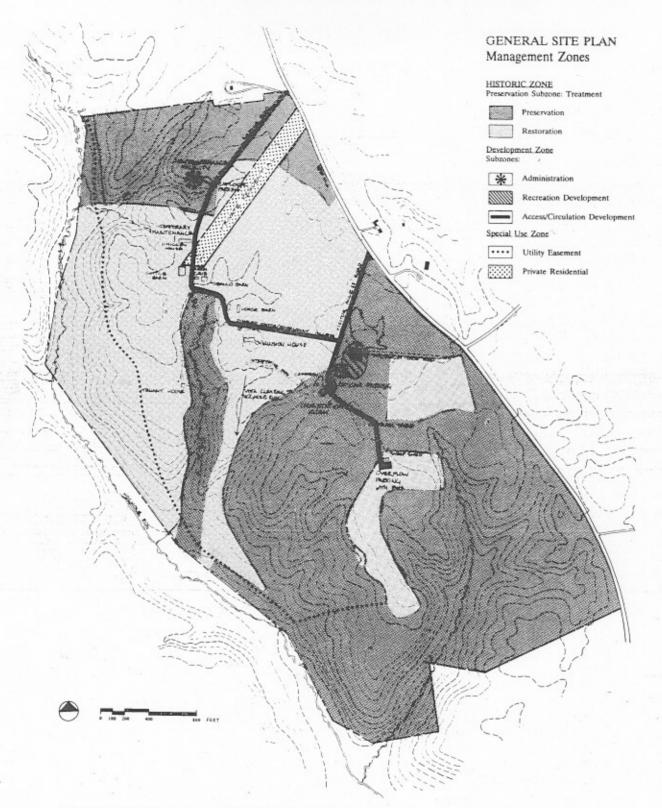
Zoning is based on the park's legislative mandate and the established management objectives. The legislative mandate authorizing Habre de Venture as a National Historic Site automatically included the entire park under the Historic zone.

Although the Historic zone protects the site's historical integrity, it does not address all of the park's management objectives. Development of the General Management Plan provides the opportunity to evaluate what additional zoning the site may require in order to reflect the site's integrity and significance as a natural resource and its suitability for development. It is proposed that most of the park remain within the Historic zone, but that two new zone categories be created: Park Development and Special Use.

The Historic and Park Development zones include several subzones that are appropriate for this site. Under the Historic zone/Preservation subzone, management emphasis will be on restoration, preservation, protection, and/or interpretation of cultural resources and their setting. Adaptive uses of the resources will be permitted providing that the particular quality that makes the resources significant will not be adversely affected and that the rehabilitation work meets the Secretary of Interior's Standards for Rehabilitation.

The Park Development zone will insure proper location and management of facilities necessary for the visitor and park administration. New parking areas, expanded or newly built entrance drives, site location for a park maintenance building and public restrooms are developments that will alter the existing historical setting. The maintenance and research facilities are included under the Administrative Development subzone. Roads and parking areas are classified in the Access/Circulation Development subzone.

A Special Use Zone applies to lands within the park boundaries that are owned or managed by others or that have only secondary NPS management influences. The AT&T underground cable easement that runs through the site will be zoned in this category.



GENERAL MANAGEMENT PLAN

Thomas Stone National Historic Site Charles County, Maryland, MARO/winter 1990/477-80004

RELATED LANDS

Surrounding Land Use

The existing wooded edge along Rose Hill Road will be retained as a buffer against visual intrusions caused by future development. Scenic easements or other land protection methods will be pursued, as the opportunity arises, in order to preserve the entrance experience of Rose Hill Road upon approaching the park entrance, and the rural (forested) scene of the ridge across Hoghole Run seen from the park's lower fields.

Charles County is experiencing an era of rapid growth and is faced with growing development pressures. In an effort to address management of future growth, the county has recently produced a Comprehensive Plan. Of particular interest to the National Historic Site is the creation of Historic Preservation Districts which address adverse development adjacent to significant historical sites.

The National Park Service will continue to maintain dialogue with the county and park neighbors to establish a cooperative conservation effort between both public and private groups and individuals interested in preserving the rural character of the historic area. A study entitled, Analysis of the Market For Tourism in Southern Maryland (Hartzog, Lader & Richards, 1983), evaluated and assessed Southern Maryland's potential for attracting tourism into the area. It considered the area's historic sites as a major asset to the region. The National

Park Service, at the request of the county, can provide technical planning assistance in evaluating and establishing linkages with other historic sites.

Private Parcel

A 6.3 acre parcel within the boundary of the park raises several issues and concerns. Preservation of the historic setting is a concern to both the National Park Service and the public. Of utmost concern is the close proximity of modern structures to the historic core of the site. Similarly, the potential for inappropriate development and land use exist under present zoning regulations. This plan recommends that the National Park Service negotiate terms with the landowner to purchase the property.

SITE MANAGEMENT

CULTURAL RESOURCE MANAGEMENT

Historic Restoration to circa 1900

The final plan proposes restoration of the exterior of the five part mansion to its appearance circa 1900. This is the earliest date in which the existing plan of the house applies. Because of the major alterations made to the house over the last two centuries, earlier restoration would require demolition of the east and/or west wings.

Restoration is also complicated by the lack of architectural documentation or fabric dating to Thomas Stone's occupancy, and the devastating fire in 1977 which destroyed much of the architectural integrity of the interior. Remaining significant archaeological and architectural resources within the wings, hyphens and main core are to be preserved.



figure 5: Early 20th century appearance of Habre de Venture

Mansion House Complex

The mansion house would be used as the primary visitor contact area. An access lift for those with mobility impairments could be incorporated into the restored porch with minimal intrusion. The front porch can also be used as a staging area for large groups or for times when there might be a wait for people to tour the house.

Reconstruction of the first floor parlor will provide visitors with a glimpse of the 18th century lifestyle of Thomas Stone. The parlor reconstruction can be accomplished by replicating the original paneling, which is owned by the Baltimore Museum of Art. A Historic Furnishings Report will be initiated to investigate the possibility of accurately furnishing the parlor to Stone's period.

The first floor center hallway and west room will be sensitively restored to evoke the turn of the century appearance. The second floor of the main house will also be sensitively restored and adaptively reused to accommodate park staff operations. The basement of the mansion will be restored. Access from the first floor center hallway will provide a second means of egress to meet safety requirements.

The east wing exterior will be restored and the interior adaptively reused as a small meeting area for school programs and park use.

An archaeological investigation has revealed an earlier foundation under the existing west hyphen and wing.

Construction techniques used in restoring the first floor of the west wing and hyphen will allow the opportunity to interpret the archaeological remains of the earlier structures dating to Stone.

These rooms will be utilized as exhibit space to interpret changing lifestyles at Habre de Venture. Visitors touring the house will exit though the west wing.

Farm and Other Structures

Selected 19th century farm buildings will be restored and interpreted using wayside exhibits. The following is a summary of proposed actions for existing structures on the site.

Restoration
Corn Crib
Tobacco Barn
19th c. portion of horsebarn
Tenant House (removal of 20th c. addition)
Cattle barn (removal of 20th c. addition)

Removal
Garden House
Garage/Apartment
Modern swimming pool
Lower terrace pond
20th c. sunken garden
20th c. portion of horsebarn
Brick entrance gate
20th c. field fences

Further Documentation Needed

Feeding station (probable removal) Farm shed and trough Sheep shed Hog barn (probable removal) Chicken House Complex (probable removal - temporary maintenance building)

Restoration of Landscape Features

The historical integrity of the landscape of Habre de Venture is one of the site's assets. Stone family correspondence, photographs dating to 1900,

archaeological findings and infra-red aerial photographs reveal how parts of the site looked at the turn of the century. Some of the present field patterns have changed little since 1900. The old entrance road is still visible and a number of the 19th century farm buildings still exist. A Cultural Landscape Study will identify historic landscape elements significant to the site. Where possible, individual elements of the 18th century farm could be restored. Following the study, management guidelines to prescribe treatment for preservation and/or restoration of landscape elements should be developed. For example, clearing a



figure 6: Landscape elements of Habre de Venture

small portion of woodland below the field south of the house will allow a vista towards Hoghole Run. Mature trees defining an old fencerow in the woods can be delineated by removing brush between and around them. Old road beds and fencelines might be cleared and maintained by periodic mowing. This kind of approach will allow the visitor to understand the changes that have occurred at Habre de Venture.

New site development will be inserted in a way that will minimize intrusion into the historic scene. The entrance drive and parking area will be constructed of stabilized gravel to help them blend into the setting. If increased visitation requires a stronger material, a chip and seal treatment using a brown or gray stone may be considered. New buildings will be sited outside of the area containing the most significant structures when possible, and will be screened from view with native vegetation.

Little documentation has been discovered which accurately depicts crop production at Habre de Venture. However, the park can still preserve its agricultural setting by maintaining fields in hay. Opportunity exists to develop exhibit plots of crops common to the site and/or area. An historic leasing or special use permit program will be initiated in order to have a farmer cut the hay.

All new electrical lines placed within the park to service new development will be buried underground. The existing overhead line will be removed and

relocated underground.

NATURAL RESOURCE MANAGEMENT

The goal in managing the site's natural resources is to provide appropriate wildlife habitat and preserve the existing wooded areas to prevent further erosion of the ravines and streambeds. Any restoration of the historic landscape will not erode ravines or deteriorate natural wetland areas. All successional and mature forest vegetation, classified under the Historic Preservation subzone, will be managed to perpetuate native species in accordance with NPS policy and regulations. Farm crops and exotic species will only be allowed in areas that are important to Habre de Venture's historical setting and interpretive program.

The Park Service strictly controls the use of pesticides on its holdings. Policy mandates that pests be managed only when there is a serious threat to the resource or to human health and safety. This policy applies to the agriculture lessee farming the site's fields, and to the underground utility easement. Park service staff will work with each lessee in developing the most effective pest management techniques for those lands.

All primary trails will be constructed to be accessible to those with mobility impairments. These trails will be constructed to blend in with the landscape. Secondary trails will be constructed of stabilized earth and will be designed for protection and preservation of the resources, as well as providing for visitor enjoyment.

All attempts will be made to improve the quality of surface water that enters Hoghole Run as a contribution to the regional goal of improving the Chesapeake Bay. This can be accomplished by controlling erosion, minimizing pesticides and avoiding development within the floodplain on the site. budget of between \$300,000 and \$350,000. An estimated staff of six full time and four seasonal employees would be needed to operate the site in this proposal.

MANAGEMENT STAFFING AND OPERATIONS

The historic site will remain under the administration of George Washington Birthplace National Monument. As Thomas Stone NHS becomes operational and the level of development increases, the site will be reviewed for management efficiency and workload. At such time, a decision will be made as to whether the site should remain under the administration of George Washington's Birthplace or should be administered separately. A site manager will administer three types of park operations: interpretation and resource management, administration, and maintenance. This would be a year round operation with increased staffing during the summer season. Operation cost estimates will depend on future planning decisions regarding the design of the site, interpretive plan, and engineering studies. NPS areas similar in scale have an annual operating

DEVELOPMENT COST ESTIMATES

The overall development cost of this plan would be \$5.6 million. In addition to federal funds, the state, county and public funds will be used to offset the development costs. The state has recently granted the National Park Service \$125,000 for restoration projects. Similarly, local organizations have contributed time and money toward various collections and restoration projects. Additional administrative costs associated with this plan total \$350,00 per year once the plan is fully implemented. This would require a total of 7.5 full time employees. The following is a detailed cost estimate to implement the recommendations of this plan:

Cultural Resource Management

Restore exterior of five-part house
(reconstruct original parlor paneling and exhibit area) 350,000
Restore basement
Restore and adaptively re-use of second floor of central core 250,000
Reconstruct porches onto house
Restore first floor of west hyphen
Adaptive re-use of second floor west hyphen; administration 140,000
Restore tobacco barn
Restore 19th century horse barn
(remove addition and barn yard)
Exterior restoration of tenant house 80,000
Landscape restoration
(garden terraces, vista clearing, recontouring) 150,000
Restore outbuildings:
cattle barn (remove addition) 55,000
corn crib
Removal of buildings and features:
lower terrace pond
20th century horse barn 6,000
other farm structures

General Development

7.	Construct new maintenance/artifact storage facility	250,000
	Maintenance access road	72,000
	Visitor access road	54,000

Visitor parking (20 cars)24,000Overflow gravel parking (30 cars)24,000Utilities400,000
Signing 60,000 Comfort station 180,000
Interpretation and Visitor Use
Interpretive exhibitry 400,000 Trails 32,000 Picnic area (15 sites) 10,000
Project Planning and Supervision
These costs include design services, preparation of construction documents, contract award and administration, construction supervision, etc
TOTAL

APPENDIX

A: Legislation

B: Analysis of Public Review of Draft GMPC: Historic Preservation Compliance

D: List of Preparers

LEGISLATION

TITLE V-- ESTABLISHMENT OF NEW AREAS AND ADDITIONS TO NATIONAL TRAILS SYSTEM

Subtitle A - Parks, Seashores, Etc.

Thomas Stone National Historic Site

SEC. 510. (a) The Secretary is authorized to acquire by donation, exchange, or purchase with donated or appropriated funds, the Thomas Stone home and grounds, known as Habre-de-Venture, located on Rose Hill Road near La Plata in Charles County, Maryland, for establishment as the Thomas Stone National Historic Site.

- (b) The national historic site shall be established by the Secretary by the publication of notice to that effect in the Federal Register at such time that he determines he has sufficient ownership to constitute an administrable unit. After such publication, the site shall be administered by the Secretary pursuant to the provisions of this section and the provisions of the Act of August 25, 1916 (39 Stat. 535), as amended and supplemented (16 U.S.C. 1 et seq.), and the Act of August 21, 1935 (49 Stat. 666; 16 U.S.C. 461-467).
- (c) To carry out the purposes of this section, there is hereby authorized to be appropriated not to exceed \$600,000 for the acquisition of lands and interests therein and not to exceed \$400,000 for development.

Approved November 10, 1978.

ANALYSIS OF PUBLIC REVIEW OF DRAFT GMP

MAILBACK

COMMENTS & CONCERNS

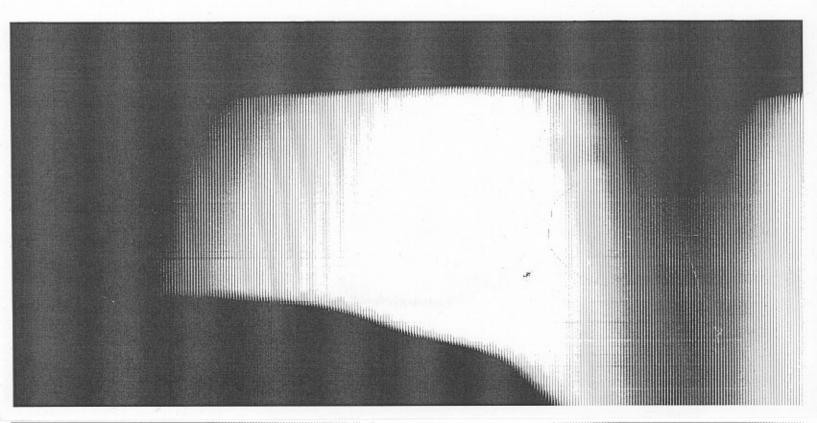
Over three hundred letters announcing the publication of the Draft General Management Plan were mailed out to individuals and organizations who have been involved with the planning process or otherwise who have requested to be on the mailing list. Additionally, copies of the plan were sent out to key agencies within the state and to organizations nationwide. The letters and media notices identified distribution centers where copies of the plan were available as well as an NPS contact for further information or mailings.

During sixty day public review period, a total of 15 letters were received with comments on the draft plan. Changes and suggestions have been incorporated in this final document to the extent possible. Of those letters, 2 came from state agencies, 1 from the county, 4 from private organizations, and 8 from individuals. The written comments generally covered five major topics: a recommended alternative, site development, interpretation, funding and cultural resources. Seven letters endorsed the Preferred Alternative, one endorsed Alternative B, and one did not concur with any of the alternatives. The remaining letters made suggestions for alterations to the plan in various topic areas. Copies of the analysis of public comment are available upon request.

Errata T. Stone GMP March, 1990

ENVIRONMENTAL COMPLIANCE

The final recommended development actions as described in the March 1990, <u>General Management Plan</u> for Thomas Stone National Historic Site do not constitute a major federal action that will significantly affect the quality of the human environment, as defined in section 102(2)(c) of the National Environmental Policy Act of 1969 (PL 91-190, 83 Stat 853). This finding is based upon the environmental assessment prepared for the study. Therefore, the National Park Service will not prepare an environmental impact statement for the <u>General Management Plan</u>.



Advisory Council On Historic Preservation

The Old Post Office Building 1100 Pennsylvania Avenue, NW, #809 Washington. DC 20004

JAN 9 1990

Mr. James W. Coleman, Jr.
Regional Director
U.S. Department of the Interior
National Park Service
Mid-Atlantic Regional Office
143 South Third Street
Philadelphia, PA 19106

REF: Draft General Management Plan Thomas Stone National Historic Site Charles County, Maryland

Dear Mr. Coleman:

As recently discussed by telephone between Clifford Tobias of your staff and Martha Catlin of this office, the Council has reviewed the Draft General Management Plan (GMP) pursuant to the 1981 Amendment to the Programmatic Memorandum of Agreement of 1979. We find the consideration of alternatives to be well balanced, and we concur in your selection of the preferred alternative. Should the final GMP reflect the preferred alternative as described in the Draft GMP, we will offer no objections.

We understand that questions have arisen among members of the public concerning the level of restoration considered by the National Park Service for this site. Although we can appreciate a desire to devote as much of the site as possible to the period of Thomas Stone's life, we support your decision to limit restoration to that which can be adequately documented. In our view, the strength of the Draft GMP is in its acknowledgment of limitations imposed by lack of available knowledge pertaining to portions of the site. The Plan properly recognizes the existence of substantial evidence of more than one significant historical period. Consequently, the site will, in our opinion, be enhanced by its representation of both the eighteenth and nineteenth centuries. Where neither historical period is directly served, it is our view that adaptive use of portions of the mansion house, as proposed, is an appropriate treatment, and also has the advantage of preventing the need for new construction to meet visitor needs. We believe that the preferred alternative embodies the best preservation decisions for the site as it has



survived. Should additional information pertaining to the undocumented portions of the house be found in the future, we assume that the proposed treatments will be reversible, to allow reconsideration of alternatives where appropriate.

We look forward to receiving the final GMP when it is available. If you have any questions, please contact Martha Catlin at FTS 786-0505. Thank you for your cooperation.

gincerely,

di L. Klima

irector, Eastern Office of Project Review

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The input and comments received from the community, government officials, interested groups and individuals and local historical groups have provided valuable information and insight throughout the planning process.

UNITED STATES
DEPARTMENT OF THE INTERIOR
National Park Service
Mid-Atlantic Regional Office
Division of Park and Resource Planning
143 South Third Street
Philadelphia, PA 19106

OFFICIAL BUSINESS

Penalty For Private Use, \$300

